

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

United States of America

Case No. 3:07-cr-183(7)

Plaintiff,

Judge Walter H. Rice

-vs.-

Delorean Davis

Defendant.

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**MOTION TO MODIFY CONDITIONS OF RELEASE**

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Now comes the Defendant, Delorean Davis, by and through counsel, and pursuant to 18 U.S.C.S. §3145 hereby requests an amendment to his conditions of release in regards only to the travel restrictions for the reasons more fully set forth in the attached Memorandum.

**MEMORANDUM**

Mr. Davis requests that the conditions of release be amended to allow his travel to Mesquite, Texas on July 1, 2009. Mr. Davis would return to Dayton on the evening of July 5, 2009. Mr. Davis' family is having a family gathering over the Fourth of July holiday weekend. Mr. Davis will be flying from Dayton to the Dallas-Ft. Worth airport. He will be staying with family members at 4729 Egret Street, Mesquite, Texas. In support of this motion, Defendant would submit he is not a risk of flight and the nature and circumstances of the offense charge would not suggest the desire to do so. There are no prior convictions of the Defendant in either State or Federal Court. Delorean Davis has strong ties to the community and is gainfully employed; further he has lived within the jurisdiction of this Court all his life. Mr. Davis has appeared at all court proceedings. Further, he presently is not on probation or parole nor is he presently under indictment on any other charges. The modification of the condition of release does not pose a danger to any person or the community by the modification of the Order. Mr. Davis has followed

all the Court's and Pretrial Services' requirements as to any modification of his release in the past.

**WHEREFORE**, for the reasons set forth herein, Defendant respectfully requests a modification of conditions of his release which would allow him to travel to Mesquite, Texas on July 1, 2009. Pretrial Services has been notified of this request.

Respectfully submitted,

/s/Anthony S. VanNoy  
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**Certificate of Service**

I hereby certify that a copy of the foregoing Motion to Modify Conditions of Release was delivered to the United States Attorney's Office and all counsel of record via electronic filing on the same date as filed.

/s/ Anthony S. VanNoy  
Anthony S. VanNoy